

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ORDER GRANTING THE CELSIUS LITIGATION ADMINISTRATOR'S  
MOTION FOR ENTRY OF AN ORDER FOR AUTHORITY TO FILE  
UNDER SEAL THE TRANSFER SCHEDULES CONTAINING CONFIDENTIAL  
INFORMATION**

Upon the motion (the “Motion to Seal”)<sup>2</sup> of the Celsius Litigation Administrator for an order under Sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, for an order authorizing the Celsius Litigation Administrator to file the Confidential Information contained in the Transfer Schedules under seal, all as more fully set forth in the Motion to Seal; and the Court having reviewed the Motion to Seal; and the Court having jurisdiction to consider the Motion to Seal and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* of the United States District Court for the District of Delaware, dated February 29, 2012 (Sleet, C.J.); and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter an order consistent with Article III of the United States Constitution; and the Court having found that venue

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion to Seal.

of this proceeding and the Motion to Seal in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion to Seal has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation and sufficient cause appearing therefor,

It is HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED, as set forth herein.
2. The Celsius Litigation Administrator is authorized to file the Transfer Schedules under seal.
3. The Transfer Schedules shall remain under seal, and shall not be made available to anyone, except that the Celsius Litigation Administrator shall provide unredacted copies of the Transfer Schedules, including all Confidential Information contained therein, to: (i) the Court, (ii) the U.S. Trustee; and (iii) counsel and financial advisors to the FTX Debtors on a confidential and “professionals’ eyes only” basis. The U.S. Trustee shall keep the Transfer Schedules strictly confidential, and counsel to the FTX Debtors shall keep the Transfer Schedules and the terms thereof strictly confidential and on a “professionals’ eyes only” basis.
4. Any party who receives the Transfer Schedules in accordance with this Order shall not disclose or otherwise disseminate such Transfer Schedules, or the information contained therein, to any other person or entity.
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Celsius Litigation Administrator is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion to Seal.

7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.